



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

August 6, 2020

VIA ECF

The Honorable Vernon S. Broderick
United States District Judge
United States District Court
40 Foley Square, Room 415
New York, New York 10007

Re: *Southern Poverty Law Center, et al. v. U.S. Department of Justice,*
18 Civ. 10861 (VSB)

Dear Judge Broderick:

On behalf of defendants United States Department of Justice (“DOJ”) and Federal Bureau of Prisons (jointly, the “Government”), I write respectfully in accordance with the Court’s endorsed order dated May 13, 2020 [Dkt. No. 36], directing the filing of a joint status update by today in the above-referenced Freedom of Information Act (“FOIA”) lawsuit.

On June 30, 2020, the Office of Information Policy issued a final production of all remaining non-exempt portions of records in its possession that were responsive to plaintiffs’ FOIA request, as narrowed by the parties in June 2019. Accordingly, all DOJ components with records responsive to the FOIA request have now completed producing copies of all portions of responsive records over which DOJ does not claim an exemption. On August 5, 2020, the parties had a telephonic meet and confer regarding next steps in this litigation. During this meet and confer, plaintiffs informed the Government that they need additional time to complete their review of the records that were released in full or in part, and requested additional information regarding those records that the Government withheld in their entirety. The parties anticipate engaging in further discussions in an attempt to resolve any outstanding issues regarding the Government’s document productions or to narrow any issues to be litigated. Accordingly, the parties request leave to submit, on or before **November 6, 2020**, a joint status report on the progress of negotiations and/or a proposed briefing schedule for summary judgment motions.

We thank the Court for its consideration of this letter.

Respectfully,

AUDREY STRAUSS
Acting United States Attorney

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